



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Solenis LLC, Milwaukee, Wisconsin

FROM: Vicky Mei, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Solenis LLC

Facility Location: 5228 N. Hopkins Street, Milwaukee, Wisconsin

Date of Virtual Inspection: September 27, 2022

Date of On-site Inspection: September 28, 2022

EPA Inspectors:

1. Vicky Mei, Environmental Engineer
2. Danny Nguyen, Environmental Engineer (at virtual inspection only)

Other Attendees

1. Scott Thomson, Plant Manager
2. Jim Faulstich, Corporate EHS Manager (at virtual inspection only)
3. Keith Budreau, Production Planner (at virtual inspection only)
4. Pat Elliott, Administrator (at virtual inspection only)
5. Abby Wojtanowski, EHS Manager
6. Jay Swann, Process Project Engineer (at virtual inspection only)

Contact Email Address: sthomson@solenis.com

Purpose of Inspection: 40 C.F.R. Part 68: Chemical Accident Prevention Provisions (CAPP)

Facility Type: Plastics material and resin manufacturer

Regulations Central to Inspection: 40 C.F.R. Part 68: CAPP

Arrival Time of Virtual Inspection: 9:00 AM CST
Departure Time of Virtual Inspection: 2:30 PM CST

Arrival Time of On-site Inspection: 11:00 AM CST
Departure Time of On-site Inspection: 12:15 PM CST

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Solenis staff and through a CAPP document review unless otherwise noted.

Process Description:

The facility produces chemical additives, such as kymene, for the paper and pulp industry. The Process entails epichlorohydrin (EPI) arriving on tanker trucks, isotainers, or rail cars for use in its container or to be transferred into a 106,000-pound working capacity storage tank, and then being piped to one of 3 reactors as a reactant to create kymene. The reaction occurs in 6 to 10-hour batches. The reactor sizes are 2,000, 6,000, and 7,000 gallons.

Staff Interview:

The facility started in 1906. The facility has a union that has decided to not participate in the inspection. There are 15 employees working on the Process. Tankers of EPI may be received at any time and day of the week. About 2 railcars are received per month. The maximum capacity for EPI is 650,000 pounds. The facility operates the chemical operations for 24 hours on 5 days per week in 3 shifts. The facility is a non-responder and works with the local fire department and Clean Harbors to handle emergencies.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

EPA conducted an extensive document review of the facility's CAPP on September 27, 2022. EPA toured the facility on September 28, 2022 during the on-site inspection and saw the EPI Process.

Photos and/or Videos: were not taken during the inspection.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

1. Management structure
2. Off-site consequence analysis
3. Process safety information
4. Process hazard analysis
5. Operating procedures
6. Lockout-tagout procedures
7. Training documentation
8. Mechanical integrity records
9. Management of change documentation
10. Pre-startup safety reviews
11. Compliance audits
12. Incident investigation reports
13. Employee participation program
14. Hot work permits
15. Contractor policy information
16. Emergency response plans and meetings

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Completed hot work permits for EPI process
- Coordination with LEPC for emergency action plan or community action plan
- Sign-In sheet for on-site drill with Fire Department
- Internal drills for notification exercises
- PSSR for 6K reactor modification in 2019
- Mechanical integrity preventive maintenance frequency of testing and inspection

Concerns:

- There was no documentation on persons responsible for implementing individual requirements of the CAPP and defining of the lines of authority through an organization chart or similar document.

- Another covered process that potentially affects public receptors different from those potentially affected by the worst-case scenario was not analyzed and reported.
- For the worst-case scenario, the quantity in the rail car was assumed to be spilled over the duration of an hour, instead of instantaneously, to form a liquid pool.
- The volatilization rate was not determined for the worst-case scenario.
- The rate of release to the air from the volatilization rate of the liquid pool was not determined.
- Smaller quantities handled at higher process temperatures or pressures and proximity to the boundary of the stationary source were not considered in selecting the worst-case scenario.
- The following alternative release scenarios were not considered: transfer hose release due to splits or sudden hose uncoupling; process piping releases from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds; process vessel or pump releases due to cracks, seal failure, or drain, bleed, or plug failure; vessel overfilling and spill, or overpressurization and venting through relief valves or rupture disks; and shipping container mishandling and breakage or puncturing leading to a spill.
- The failure scenarios identified under 68.50 were not considered in selecting the alternative release scenario.
- The following were not identified in the off-site impact analysis: the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings.
- The following were not identified in the off-site impact analysis: the environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to the endpoint.
- The facility did not rely on information provided on local U.S.G.S. maps, or on any data source containing U.S.G.S. data to identify environmental receptors.
- The worst-case and alternative release scenarios did not include the following documentation: the assumptions and parameters used, the rationale for selection, and anticipated effect of the administrative controls and mitigation on the release quantity and rate.
- The facility has not documented that equipment complies with recognized and generally accepted good engineering practices.
- The process hazard analysis did not include a qualitative evaluation of a range of the possible safety and health effects of failure of controls.
- The facility had not explained to the contract owner or operator the applicable provisions of the emergency response or the emergency action program.

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____

RMP Program Level 3 Process Checklist

General Facility Information

Facility Name:	Solenis LLC - Milwaukee Plant		
Mailing Address (Street, City, State, Zip):	5228 N. Hopkins Street Milwaukee, Wisconsin 53209		
Physical Address (Street, City, State, Zip):	5228 N. Hopkins Street Milwaukee, Wisconsin 53209		
Latitude/Longitude: (Source)	43.112500/-087.963056 (RMP)		
County:	Milwaukee		
RMP Number/ FRS Number:	1000 0008 8451		
Facility Contact (Name, Title):	Scott Thomson, Plant Manager		
Facility Contact Phone No:	8660337-1533	Facility Contact Email:	sthomson@solenis.com
Reported NAICS Code(s):	325211 (Plastics Material and Resin Manufacturing)		

Inspection Information

Inspection Begin Date:	September 27, 2022	Inspection End Date:	September 28, 2022
Arrival Time:	9:00 AM	Departure Time:	12:30 PM
Lead Inspector	Name:	Organization:	Phone No./Email:
	Vicky Mei	EPA	312-353-2054 mei.vicky@epa.gov
Participating Inspectors	Danny Nguyen	EPA	440-250-1709 nguyen.danny@epa.gov

Subpart A – General [68.10-15]

General requirements followed and implemented as in 40 CFR 68.10-15?

Comments:

General: Applicability [68.10]

- | | |
|---|---|
| 1. Has the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115, complied with the requirements of this part no later than the latest of the following dates [68.10(a)]:

<input checked="" type="checkbox"/> June 21, 1999? [68.10(a)(1)];
<input type="checkbox"/> Three years after the date on which a regulated substance is first listed under §68.130? [68.10(a)(2)];
<input type="checkbox"/> The date on which a regulated substance is first present above a threshold quantity in a process? [68.10(a)(3)]; or
<input type="checkbox"/> For any revisions to this part, the effective date of the final rule that revises this part? [68.10(a)(4)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Has the owner or operator complied with the emergency coordination activities in accordance with §68.93 by September 21, 2018? [68.10(b)] (See Items 2 through 5 of Subpart E) | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Has the owner or operator developed and implemented an emergency response program in accordance with §68.95 within three years of when the owner or operator determined that the stationary source is subject to the emergency response program requirements of §68.95? [68.10(c)] (See Items 1.b.(2) – 1.b.(7) of Subpart E) | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 4. Has the owner or operator developed plans for conducting emergency response exercises in accordance with §68.96 by December 19, 2023? [68.10(d)] (See Items 1.b.(8) – 1.b.(17) , 6 , and 7 of Subpart E) | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 5. Has the owner or operator complied with the public meeting requirement in §68.210(b) within 90 days of any RMP reportable accident at the stationary source with known offsite impacts specified in §68.42(a), that occurs after March 15, 2021? [68.10(e)] (See Item 2 of Subpart H) | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 6. <u>After December 19, 2024</u> , has the owner or operator reported in the RMP submission: [68.10(f)]
<input type="checkbox"/> A public meeting after an RMP reportable accident under §68.160(b)(21)? [68.10(f)(1)];
<input type="checkbox"/> Emergency response program information under §68.180(a)(1)? [68.10(f)(2)];
<input type="checkbox"/> Emergency response program information under §68.180(a)(2) and (3)? [68.10(f)(3)]; and,
<input type="checkbox"/> Emergency response program and exercises information under §68.180(b), as applicable? Including submittal of the following: [68.10(f)(4)]
<input type="checkbox"/> Dates of the most recent notification,
<input type="checkbox"/> Dates of field and tabletop exercises in the risk management plan,
<input type="checkbox"/> Dates for exercises completed as required under §68.96 at the time the risk management plan is either submitted under §68.150(b)(2) or (3), or is updated under §68.190. | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

RMP Program Level 3 Process ChecklistFacility Name: **Solenis LLC - Milwaukee Pl****General: Program Eligibility [68.10(g)-(i)]**

7. Does the covered process meet the eligibility requirements of Program 1? Specifically: [68.10(g)]

☐ Y ☒ N ☐ N/ADoes the covered process meet **all** of the following requirements:

- ☐ For the five years prior to the submission of an RMP, the process has **not** had an accidental release of a regulated substance where exposure to the substance, its reaction products, overpressure generated by an explosion involving the substance, or radiant heat generated by a fire involving the substance led to any of the following offsite? [68.10(g)(1)];
 - ☐ Death; [68.10(g)(1)(i)]
 - ☐ Injury; [68.10(g)(1)(ii)] or,
 - ☐ Response or restoration activities for an exposure of an environmental receptor; [68.10(g)(1)(iii)] **and**
- ☐ The distance to a toxic or flammable endpoint for a worst-case release assessment conducted under subpart B and §68.25 is less than the distance to any public receptor, as defined in §68.3 [68.10(g)(2)]; **and**
- ☐ Emergency response procedures have been coordinated between the stationary source and local emergency planning and response organizations [68.10(g)(3)]

8. Does the covered process meet the eligibility requirements of Program 3? Specifically: [68.10(i)]

☒ Y ☐ N ☐ N/A☐ The process does not meet the eligibility requirements of Program 1. [68.10(i)]; **and**

Is the covered process any of the following NAICS codes: [68.10(i)(1)]

- ☐ 32211, 32411, 32511, 325181, 325188, 325192, 325199, 325211, 325311, or 32532; **or**
- ☐ Is the process subject to the OSHA process safety management standard, 29 CFR 1910.119? [68.10(i)(2)]

9. Does the covered process fail to meet the eligibility requirements of Program 1 and Program 3 (i.e., is the covered process a Program 2)? [68.10(h)]

☐ Y ☒ N ☐ N/A**General: Management [68.15]**

Has the owner or operator:

10. Developed a management system to oversee the implementation of the risk management program elements? [68.15(a)]

☒ Y ☐ N ☐ N/A

11. Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements? [68.15(b)]

☒ Y ☐ N ☐ N/A

12. Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document? [68.15(c)]

☐ Y ☒ N ☐ N/A**Subpart B - Hazard Assessment [68.20-68.42]**

Hazard assessment conducted and documented as provided in 40 CFR 68.20-68.42?

Comments:

Hazard Assessment: Offsite consequence analysis parameters [68.22]

1. Used the following endpoints for offsite consequence analysis for a worst-case scenario: [68.22(a)] <input checked="" type="checkbox"/> For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] <input type="checkbox"/> For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or <input type="checkbox"/> For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] <input type="checkbox"/> For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
2. Used the following endpoints for offsite consequence analysis for an alternative release scenario: [68.22(a)] <input checked="" type="checkbox"/> For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] <input type="checkbox"/> For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)] <input type="checkbox"/> For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] <input type="checkbox"/> For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
3. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
4. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
5. Used appropriate values for the height of the release for the release analysis? [68.22(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
6. Used appropriate surface roughness values for the release analysis? [68.22(e)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
7. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
8. Were liquids, other than gases liquefied by refrigeration only, considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for a stationary source, or at process temperature, whichever is higher? [68.22(g)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Hazard Assessment: Worst-case release scenario analysis [68.25]

9. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated toxic substance from covered processes under worst-case conditions? [68.25(a)(2)(i)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
10. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated flammable substance from covered processes under worst-case conditions? [68.25(a)(2)(ii)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
11. Analyzed and reported in the RMP additional worst-case release scenarios for a hazard class if the worst-case release from another covered process at the stationary source potentially affects public receptors different from those potentially affected by the worst-case release scenario developed under 68.25(a)(2)(i) or 68.25(a)(2)(ii)? [68.25(a)(2)(iii)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
12. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] <input type="checkbox"/> If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)] <input type="checkbox"/> If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

RMP Program Level 3 Process Checklist
Facility Name: Solenis LLC - Milwaukee Pl

13.a. Has the owner or operator for toxic substances that are normally gases at ambient temperature and handled as a gas or liquid under pressure:

13.a.(1) Assumed the whole quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)] ☐ Y ☐ N ☒ N/A

13.a.(2) Assumed the release rate to be the total quantity divided by 10, if there are no passive mitigation systems in place? [68.25(c)(1)] ☐ Y ☐ N ☒ N/A

13.b. Has the owner or operator for toxic gases handled as refrigerated liquids at ambient pressure:

13.b.(1) Assumed the substance would be released as a gas in 10 minutes, if not contained by passive mitigation systems or if the contained pool would have a depth of 1 cm or less? [68.25(c)(2)(i)] ☐ Y ☐ N ☒ N/A

13.b.(2) If released substance would be contained by passive mitigation systems in a pool with a depth > 1 cm;
☐ Assumed the quantity in the vessel or pipe (as determined per 68.25(b)) would be spilled instantaneously to form a liquid pool? [68.25(c)(2)(ii)] ☐ Y ☐ N ☒ N/A
☐ Calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)]

13.c. Has the owner or operator for toxic substances that are normally liquids at ambient temperature:

13.c.(1) Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)] ☐ Y ☒ N ☐ N/A

13.c.(2) Determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, if there is no passive mitigation system in place that would serve to contain the spill and limit the surface area, or if passive mitigation is in place, was the surface area of the contained liquid used to calculate the volatilization rate? [68.25(d)(1)(i)] ☒ Y ☐ N ☐ N/A

13.c.(3) Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)] ☐ Y ☐ N ☒ N/A

13.c.(4) Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)] ☐ Y ☒ N ☐ N/A

13.c.(5) Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)] ☐ Y ☒ N ☐ N/A

13.c.(6) Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)] ☒ Y ☐ N ☐ N/A

What modeling technique did the owner or operator use? [68.25(g)] ALOHA and MarPlot

13.d. Has the owner or operator for flammable gases:

13.d.(1) Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(1)] ☐ Y ☐ N ☒ N/A

13.d.(2) For gas handled as refrigerated liquid that is not contained by passive mitigation systems, assumed the total quantity in a vessel(s) of refrigerated liquid is released as a gas over 10 minutes resulting in a vapor cloud explosion? [68.25(e)(2)(i)] ☐ Y ☐ N ☒ N/A

13.d.(3) For gas handled as refrigerated liquid released to a contained area, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(e)(2)(ii)] ☐ Y ☐ N ☒ N/A

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Facility Name: Solenis LLC - Milwaukee PH

13.d.(4) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
13.e. Has the owner or operator for <u>flammable liquids</u> :	
13.e.(1) Assumed the entire quantity in the vessel or pipe, taking into account administrative controls that limit the maximum quantity, would be spilled instantaneously to form a liquid pool? [68.25(f)(1)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
13.e.(2) For liquids at temperatures below their atmospheric boiling point, calculated the volatility rate at the boiling point of the substance and at the conditions specified in 68.25(d) and assumed that the quantity which becomes vapor in the first 10 minutes is involved in the vapor cloud explosion? [68.25(f)(1)-(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
13.e.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(f)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
14. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
15. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)] What modeling technique did the owner or operator use? [68.25(g)] <u>ALOHA and MarPlot</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
16. Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
17. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] <input type="checkbox"/> Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] <input type="checkbox"/> Proximity to the boundary of the stationary source? [68.25(i)(2)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A

Hazard Assessment: Alternative release scenario analysis [68.28]

18. Identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes? [68.28(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
19. Selected a scenario: [68.28(b)] <input checked="" type="checkbox"/> That is more likely to occur than the worst-case release scenario under 68.25? [68.28(b)(1)(i)] <input type="checkbox"/> That will reach an endpoint off-site, unless no such scenario exists? [68.28(b)(1)(ii)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
20. Considered release scenarios which included, but are not limited to, the following: [68.28(b)(2)] <input type="checkbox"/> Transfer hose releases due to splits or sudden hose uncoupling? [68.28(b)(2)(i)] <input type="checkbox"/> Process piping releases from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds? [68.28(b)(2)(ii)] <input type="checkbox"/> Process vessel or pump releases due to cracks, seal failure, or drain, bleed, or plug failure? [68.28(b)(2)(iii)] <input type="checkbox"/> Vessel overfilling and spill, or overpressurization and venting through relief valves or rupture disks? [68.28(b)(2)(iv)] <input type="checkbox"/> Shipping container mishandling and breakage or puncturing leading to a spill? [68.28(b)(2)(v)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
21. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.28(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

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22. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.28(c)] What modeling technique did the owner or operator use? [68.25(g)] <u>ALOHA and MarPlot</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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23. Ensured that the passive and active mitigation systems, if considered, are capable of withstanding the release event triggering the scenario and will be functional? [68.28(d)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
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24. Considered the following factors in selecting the alternative release scenarios: [68.28(e)] <input type="checkbox"/> The five-year accident history provided in 68.42? [68.28(e)(1)] <input type="checkbox"/> Failure scenarios identified under 68.50? [68.28(e)(2)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
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Hazard Assessment: Defining off-site impacts—Population [68.30]

25. Estimated population that would be included within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.30(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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26. Identified the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings in the RMP? [68.30(b)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
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27. Used most recent Census data, or other updated information to estimate the population? [68.30(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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28. Estimated the population to two significant digits? [68.30(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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Hazard Assessment: Defining off-site impacts—Environment [68.33]

29. Identified environmental receptors within a circle where its center is the point of the release and a radius determined by the distance to the endpoint? [68.33(a)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
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30. Relied on information provided on local U.S.G.S. maps, or on any data source containing U.S.G.S. data to identify environmental receptors? [Source may have used LandView to obtain information] [68.33(b)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
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Hazard Assessment: Review and update [68.36]

31. Reviewed and updated the off-site consequence analyses at least once every five years? [68.36(a)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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32. Completed a revised analysis and submit a revised RMP within six months of a change in processes, quantities stored or handled, or any other aspect that might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more? [68.36(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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Hazard Assessment: Documentation [68.39]

33. Has the owner or operator maintained the following records on the offsite consequence analyses:

33.a For worst-case scenarios: a description of the vessel or pipeline and substance selected, assumptions and parameters used, the rationale for selection, and anticipated effect of the administrative controls and passive mitigation on the release quantity and rate? [68.39(a)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
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33.b For alternative release scenarios: a description of the scenarios identified, assumptions and parameters used, the rationale for the selection of specific scenarios, and anticipated effect of the administrative controls and mitigation on the release quantity and rate? [68.39(b)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
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33.c Documentation of estimated quantity released, release rate, and duration of release? [68.39(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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33.d Methodology used to determine distance to endpoints? [68.39(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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33.e Data used to estimate population and environmental receptors potentially affected? [68.39(e)]

☐ Y ☒ N ☐ N/A**Hazard Assessment: Five-year accident history [68.42]**

34. Has the owner or operator included all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage? [68.42(a)]

☐ Y ☐ N ☒ N/A

35. Has the owner or operator reported the following information for each accidental release: [68.42(b)]

☐ Y ☐ N ☒ N/A

- ☐ Date, time, and approximate duration of the release? [68.42(b)(1)]
- ☐ Chemical(s) released? [68.42(b)(2)]
- ☐ Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)]
- ☐ NAICS code for the process? [68.42(b)(4)]
- ☐ The type of release event and its source? [68.42(b)(5)]
- ☐ Weather conditions (if known)? [68.42(b)(6)]
- ☐ On-site impacts? [68.42(b)(7)]
- ☐ Known offsite impacts? [68.42(b)(8)]
- ☐ Initiating event and contributing factors (if known)? [68.42(b)(9)]
- ☐ Whether offsite responders were notified (if known)? [68.42(b)(10)]
- ☐ Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]

Subpart D - Program 3 Prevention Program [68.65-68.87]

Implemented the Program 3 prevention requirements as provided in 40 CFR 68.48 - 68.60?

Comments:

Prevention Program: Process safety information [68.65]

1. Has the owner or operator compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by the rule? [68.65(a)]

☒ Y ☐ N ☐ N/A

Does the process safety information contain the following for hazards of the substances: [68.65(b)]

- ☒ Toxicity information? [68.65(b)(1)]
- ☒ Permissible exposure limits? [68.65(b)(2)]
- ☒ Physical data? [68.65(b)(3)]
- ☒ Reactivity data? [68.65(b)(4)]
- ☒ Corrosivity data? [68.65(b)(5)]
- ☒ Thermal and chemical stability data? [68.65(b)(6)]
- ☒ Hazardous effects of inadvertent mixing of materials that could foreseeably occur? [68.65(b)(7)]

Note: Safety Data Sheets (SDS) meeting the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)] may be used to comply with this requirement to the extent they contain the information required by 68.65(b).

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2. Does the process safety information contain information pertaining to technology of the process [68.65(c)]? Does the information concerning the technology of the process include the following: [68.65(c)(1)] <input checked="" type="checkbox"/> A block flow diagram or simplified process flow diagram? [68.65(c)(1)(i)] <input checked="" type="checkbox"/> Process chemistry? [68.65(c)(1)(ii)] <input checked="" type="checkbox"/> Maximum intended inventory? [68.65(c)(1)(iii)] <input checked="" type="checkbox"/> Safe upper and lower limits for such items as temperatures, pressures, flows, or compositions? [68.65(c)(1)(iv)] <input checked="" type="checkbox"/> An evaluation of the consequences of deviation? [68.65(c)(1)(iv)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
3. Does the process safety information contain information pertaining to the equipment in the process? [68.65(d)] Does the information pertaining to the equipment in the process include the following: [68.65(d)(1)] <input checked="" type="checkbox"/> Materials of construction? 68.65(d)(1)(i)] <input checked="" type="checkbox"/> Piping and instrumentation diagrams [68.65(d)(1)(ii)] <input checked="" type="checkbox"/> Electrical classification? [68.65(d)(1)(iii)] <input checked="" type="checkbox"/> Relief system design and design basis? [68.65(d)(1)(iv)] <input checked="" type="checkbox"/> Ventilation system design? [68.65(d)(1)(v)] <input checked="" type="checkbox"/> Design codes and standards employed? [68.65(d)(1)(vi)] <input checked="" type="checkbox"/> Material and energy balances for processes built after June 21, 1999? [68.65(d)(1)(vii)] <input checked="" type="checkbox"/> Safety systems? [68.65(d)(1)(viii)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
4. Has the owner or operator documented that equipment complies with recognized and generally accepted good engineering practices? [68.65(d)(2)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
5. Has the owner or operator determined and documented that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner? [68.65(d)(3)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A

Prevention Program: Process hazard analysis [68.67]

6. Has the owner or operator performed an initial process hazard analysis (PHA), and has this analysis identified, evaluated, and controlled the hazards involved in the process? [68.67(a)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
7. Has the owner or operator determined and documented the priority order for conducting PHAs, and was it based on an appropriate rationale? [68.67(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
8. Has the owner used one or more of the following technologies to conduct process PHA: [68.67(b)] <input checked="" type="checkbox"/> What-if? [68.67(b)(1)] <input checked="" type="checkbox"/> Checklist? [68.67(b)(2)] <input type="checkbox"/> What-if/Checklist? [68.67(b)(3)] <input type="checkbox"/> Hazard and Operability Study (HAZOP) [68.67(b)(4)] <input type="checkbox"/> Failure Mode and Effects Analysis (FMEA) [68.67(b)(5)] <input type="checkbox"/> Fault Tree Analysis? [68.67(b)(6)] <input type="checkbox"/> An appropriate equivalent methodology? [68.67(b)(7)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

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9. Did the PHA address: <input checked="" type="checkbox"/> The hazards of the process? [68.67(c)(1)] <input type="checkbox"/> Identification of any incident that had a likely potential for catastrophic consequences? [68.67(c)(2)] <input checked="" type="checkbox"/> Engineering and administrative controls applicable to hazards and interrelationships?[68.67(c)(3)] <input checked="" type="checkbox"/> Consequences of failure of engineering and administrative controls? [68.67(c)(4)] <input checked="" type="checkbox"/> Stationary source siting? [68.67(c)(5)] <input checked="" type="checkbox"/> Human factors? [68.67(c)(6)] <input type="checkbox"/> A qualitative evaluation of a range of the possible safety and health effects of failure of controls? [68.67(c)(7)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
10. Was the PHA performed by a team with expertise in engineering and process operations and did the team include at least one employee who has experience and knowledge specific to the process being evaluated and at least one member of the team who is knowledgeable in the specific process hazard analysis methodology being used?? [68.67(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
11. Has the owner or operator completed the following: [68.67(e)] <input checked="" type="checkbox"/> Established a system to promptly address the team's findings and recommendations? <input checked="" type="checkbox"/> Assured that the recommendations are resolved in a timely manner and documented? <input checked="" type="checkbox"/> Documented what actions are to be taken? <input checked="" type="checkbox"/> Completed actions as soon as possible? <input checked="" type="checkbox"/> Developed a written schedule of when these actions are to be completed? and <input checked="" type="checkbox"/> Communicated the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
12. Has the PHA been updated and revalidated by a team every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process? [68.67(f)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
13. Has the owner or operator retained PHAs and updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process? [68.67(g)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Prevention Program: Operating procedures [68.69]	
14. Has the owner or operator developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information? [68.69(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

<p>15. Do the procedures address the following: [68.69(a)]</p> <p><u>Steps for each operating phase: [68.69(a)(1)]</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Initial Startup? [68.69(a)(1)(i)] <input type="checkbox"/> Normal operations? [68.69(a)(1)(ii)] <input type="checkbox"/> Temporary operations? [68.69(a)(1)(iii)] <input type="checkbox"/> Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner? [68.69(a)(1)(iv)] <input type="checkbox"/> Emergency operations? [68.69(a)(1)(v)] <input type="checkbox"/> Normal shutdown? [68.69(a)(1)(vi)] <input type="checkbox"/> Startup following a turnaround, or after emergency shutdown? [68.69(a)(1)(vii)] <p><u>Operating limits: [68.69(a)(2)]</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Consequences of deviations [68.69(a)(2)(i)] <input type="checkbox"/> Steps required to correct or avoid deviation? [68.69(a)(2)(ii)] <p><u>Safety and health considerations: [68.69(a)(3)]</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Properties of, and physical hazards presented by, the chemicals used in the process [68.69(a)(3)(i)] <input type="checkbox"/> Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment? [68.69(a)(3)(ii)] <input type="checkbox"/> Control measures to be taken if physical contact or airborne exposure occurs? [68.69(a)(3)(iii)] <input type="checkbox"/> Quality control for raw materials and control of hazardous chemical inventory levels? [68.69(a)(3)(iv)] <input type="checkbox"/> Any special or unique hazards? [68.69(a)(3)(v)] <input type="checkbox"/> <u>Safety systems and their functions? [68.69(a)(4)]</u> 	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>16. Are operating procedures readily accessible to employees who are involved in a process? [68.69(b)]</p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>17. Has the owner or operator certified annually that the operating procedures are current and accurate and that procedures have been reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to stationary sources? [68.69(c)]</p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>18. Has the owner or operator developed and implemented safe work practices to provide for the control of hazards during specific operations, such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a stationary source by maintenance, contractor, laboratory, or other support personnel? [68.69(d)]</p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>Prevention Program: Training [68.71]</p>	
<p>19. Has each employee involved in operating a process, and each employee before being involved in operating a newly assigned process, been initially trained in an overview of the process and in the operating procedures? [68.71(a)(1)]</p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>20. Did initial training include emphasis on safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks? [68.71(a)(1)]</p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
<p>21. In lieu of initial training for those employees already involved in operating a process on June 21, 1999, an owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures [68.71(a)(2)]</p>	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

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22. Has refresher training been provided at least every three years, or more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process? [68.71(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
23. Has owner or operator ascertained and documented in record that each employee involved in operating a process has received and understood the training required? [68.71(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
24. Does the prepared record contain the identity of the employee, the date of the training, and the means used to verify that the employee understood the training? [68.71(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Mechanical integrity [68.73]

25. Has the owner or operator established and implemented written procedures to maintain the on-going integrity of the process equipment listed in 68.73(a)? [68.73(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
26. Has the owner or operator trained each employee involved in maintaining the on-going integrity of process equipment? [68.73(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
27. Has the owner or operator performed inspections and tests on process equipment? [68.73(d)(1)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
28. Has the owner or operator followed recognized and generally accepted good engineering practices for inspections and testing procedures? [68.73(d)(2)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
29. Has the owner or operator ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience? [68.73(d)(3)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
30. Has the owner or operator documented each inspection and test that had been performed on process equipment, and identified the following: [68.73(d)(4)] <input checked="" type="checkbox"/> The date of the inspection or test? <input checked="" type="checkbox"/> The name of the person who performed the inspection or test? <input checked="" type="checkbox"/> The serial number or other identifier of the equipment on which the inspection or test was performed? <input checked="" type="checkbox"/> A description of the inspection or test performed? and <input checked="" type="checkbox"/> The results of the inspection or test?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
31. Has the owner or operator corrected deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner when necessary means were taken to assure safe operation? [68.73(e)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
32. Has the owner or operator assured that equipment as it was fabricated is suitable for the process application for which it will be used in the construction of new plants and equipment? [68.73(f)(1)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
33. Has the owner or operator performed appropriate checks and inspections to assure that equipment was installed properly and consistent with design specifications and the manufacturer's instructions? [68.73(f)(2)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
34. Has the owner or operator assured that maintenance materials, spare parts and equipment were suitable for the process application for which they would be used? [68.73(f)(3)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Management of change [68.75]

35. Has the owner or operator established and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process? [68.75(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
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36. Do procedures assure that the following considerations are addressed prior to any change: [68.75(b)] <input checked="" type="checkbox"/> The technical basis for the proposed change? [68.75(b)(1)] <input checked="" type="checkbox"/> Impact of change on safety and health? [68.75(b)(2)] <input checked="" type="checkbox"/> Modifications to operating procedures? [68.75(b)(3)] <input checked="" type="checkbox"/> Necessary time period for the change? [68.75(b)(4)] <input checked="" type="checkbox"/> Authorization requirements for the proposed change? [68.75(b)(5)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
37. Were employees, involved in operating a process and maintenance, and contract employees, whose job tasks would be affected by a change in the process, informed of, and trained in, the change prior to start-up of the process or affected parts of the process? [68.75(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
38. If a change resulted in a change in the process safety information, was such information updated accordingly? [68.75(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
39. If a change resulted in a change in the operating procedures or practices, had such procedures or practices been updated accordingly? [68.75(e)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Pre-startup safety review [68.77]

40. Has the owner or operator performed a pre-startup safety review for new stationary sources and for modified stationary sources when the modification is significant enough to require a change in the process safety information? [68.77(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
41. Does the pre-startup safety review confirm the following prior to the introduction of a regulated substance to a process: [68.77(b)] <input type="checkbox"/> Construction and equipment was in accordance with design specifications? [68.77(b)(1)] <input type="checkbox"/> Safety, operating, maintenance, and emergency procedures were in place and were adequate? [68.77(b)(2)] <input type="checkbox"/> For new stationary sources, a process hazard analysis had been performed and recommendations had been resolved or implemented before startup? [68.77(b)(3)] <input type="checkbox"/> Modified stationary sources meet the requirements contained in management of change? [68.77(b)(3)] <input type="checkbox"/> Training of each employee involved in operating a process had been completed? [68.77(b)(4)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Compliance audits [68.79]

42. Has the owner or operator certified that the stationary source has evaluated compliance with the provisions of the prevention program at least every three years to verify that the developed procedures and practices are adequate and being followed? [68.79(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
43. Has the audit been conducted by at least one person knowledgeable in the process? [68.79(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
44. Are the audit findings documented in a report? [68.79(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
45. Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies had been corrected? [68.79(d)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
46. Has the owner or operator retained the two most recent compliance reports? [68.79(e)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Incident investigation [68.81]

47. Has the owner or operator investigated each incident that resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance? [68.81(a)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
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48. Were all incident investigations initiated not later than 48 hours following the incident? [68.81(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
49. Was an accident investigation team established and did it consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of a contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident? [68.81(c)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
50. Was a report prepared at the conclusion of every investigation? [68.81(d)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
51. Does every report include: [68.81(d)] <input type="checkbox"/> Date of incident? [68.81(d)(1)] <input type="checkbox"/> Date investigation began? [68.81(d)(2)] <input type="checkbox"/> A description of the incident? [68.81(d)(3)] <input type="checkbox"/> The factors that contributed to the incident? [68.81(d)(4)] <input type="checkbox"/> Any recommendations resulting from the investigation? [68.81(d)(5)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
52. Has the owner or operator established a system to promptly address and resolve the incident report findings and recommendations, and are the resolutions and corrective actions documented? [68.81(e)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
53. Was the report reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable? [68.81(f)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
54. Has the owner or operator retained incident investigation reports for at least five years? [68.81(g)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A

Prevention Program: Employee participation [68.83]

55. Has the owner or operator developed a written plan of action regarding the implementation of the employee participation required by this section? [68.83(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
56. Has the owner or operator consulted with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in chemical accident prevention provisions? [68.83(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
57. Has the owner or operator provided to employees and their representatives access to process hazards analyses and to all other information required to be developed under the chemical accident prevention rule? [68.83(c)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Hot work permit [68.85]

58. Has the owner or operator issued a hot work permit for each hot work operation conducted on or near a covered process? [68.85(a)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
59. Does the permit document that the fire prevention and protection requirements in 29CFR 1910.252(a) have been implemented prior to beginning the hot work operations? [68.85(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
60. Does the permit indicate the date(s) authorized for hot work and the object(s) upon which hot work is to be performed? [68.85(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
61. Are the permits being kept on file until completion of the hot work operations? [68.85(b)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Prevention Program: Contractors [68.87]

62. Has the owner or operator obtained and evaluated information regarding the contract owner or operator's safety performance and programs when selecting a contractor? [68.87(b)(1)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
63. Has the owner or operator informed contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process? [68.87(b)(2)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

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64. Has the owner or operator explained to the contract owner or operator the applicable provisions of the emergency response or the emergency action program? [68.87(b)(3)]	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
65. Has the owner or operator developed and implemented safe work practices consistent with §68.69(d), to control the entrance, presence, and exit of the contract owner or operator and contract employees in the covered process areas? [68.87(b)(4)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
66. Periodically evaluated the performance of the contract owner or operator in fulfilling their obligations (as described at 68.87(c)(1) – (c)(5))? [68.87(b)(5)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

Subpart E - Emergency Response [68.90 - 68.96]

Developed and implemented an emergency response program as provided in 40 CFR 68.90-68.96?

Comments:

1. Is the facility designated as a “responding stationary source”?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A
1.a. If the facility is not a responding stationary source, it need not comply with §68.95 if the following conditions are met:	
1.a.(1) For stationary sources with any regulated substances held in a process above threshold quantities, is the source included in the community emergency response plan developed under 42 U.S.C. 11003? [68.90(b)(1)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
1.a.(2) For stationary sources with only regulated flammable substances held in a process above threshold quantities, has the owner or operator coordinated response actions with the local fire department? [68.90(b)(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.a.(3) Are appropriate mechanisms in place to notify emergency responders when there is need for a response? [68.90(b)(3)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
1.a.(4) As of September 21, 2018, has the owner or operator performed the annual emergency response coordination activities required under § 68.93? [68.90(b)(4)] (See Items 2 through 5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
1.a.(5) Has the owner or operator performed the annual notification exercises required under § 68.96(a) before December 19, 2024? [68.90(b)(5)] (See Items 6 and 7)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A

For non-responding stationary sources where 1.a.(1)-(5) are all marked as ‘Y’, proceed to Subpart E Item [2](#)

1.b. If the facility is a responding stationary source:	
1.b.(1) Has the owner or operator developed and implemented an emergency response program that includes the elements required in § 68.95(a)(1-4)? [68.95(a)] (See Items 1.b.(2) – 1.b.(5))	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(2). An emergency response plan is maintained at the stationary source and contains the following? [68.95(a)(1)] <input type="checkbox"/> Procedures for informing the public and the appropriate Federal, state, and local emergency response agencies about accidental releases? [68.95(a)(1)(i)] <input type="checkbox"/> Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures? [68.95(a)(1)(ii)] <input type="checkbox"/> Procedures and measures for emergency response after an accidental release of a regulated substance? [68.95(a)(1)(iii)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(3) Does the emergency response program contains procedures for the use of emergency response equipment and for its inspection, testing, and maintenance? [68.95(a)(2)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(4) Does the emergency response program include training for all employees in relevant procedures? [68.95(a)(3)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(5) Does the emergency response program include procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes? [68.95(a)(4)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A

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1.b.(6) Does the emergency response program include a written plan that complies with other Federal contingency plan regulations or is consistent with the approach in the National Response Team's Integrated Contingency Plan Guidance ("One Plan")? If so, does the plan include the elements provided in paragraph (a) of 68.95, and also complies with paragraph (c) of 68.95? [68.95(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(7) Has the emergency response plan been coordinated with the community emergency response plan developed under EPCRA? [68.95(c)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(8) Has the owner or operator developed and implemented an exercise program for its emergency response program, including the emergency plan required under § 68.95(a)(1)? [68.96(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(9) Do the exercises involve facility emergency response personnel and, as appropriate, emergency response contractors? [68.96(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(10) When planning emergency response field and tabletop exercises, has the owner or operator coordinated with local public emergency response officials and invite them to participate in the exercise? [68.96(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(11) Does the emergency response exercise program include: [68.96(b)] <input type="checkbox"/> Emergency response field exercises? [68.96(b)(1)] <input type="checkbox"/> Tabletop exercises? [68.96(b)(2)] <input type="checkbox"/> Documentation? [68.96(b)(3)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(12) As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for field exercises? [68.96(b)(1)(i)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(13) Field exercises shall involve tests of the source's emergency response plan, including deployment of emergency response personnel and equipment. Do field exercises include: [68.96(b)(1)(ii)] <input type="checkbox"/> Tests of procedures to notify the public and the appropriate Federal, state, and local emergency response agencies about an accidental release? <input type="checkbox"/> Tests of procedures and measures for emergency response actions including evacuations and medical treatment? <input type="checkbox"/> Tests of communications systems? <input type="checkbox"/> Mobilization of facility emergency response personnel, including contractors, as appropriate? <input type="checkbox"/> Coordination with local emergency responders? <input type="checkbox"/> Emergency response equipment deployment? <input type="checkbox"/> Any other action identified in the emergency response program, as appropriate?	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(14) As part of coordination with local emergency response officials, has the owner or operator consulted with these officials to establish an appropriate frequency for tabletop exercises and conducted a tabletop exercise before December 21, 2026 and at a minimum of at least once every three years thereafter? [68.96(b)(2)(i)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
1.b.(15) Tabletop exercises shall involve discussions of the source's emergency response plan. Do the exercises include discussions of: [68.96(b)(2)(ii)] <input type="checkbox"/> Procedures to notify the public and the appropriate Federal, state, and local emergency response agencies? <input type="checkbox"/> Procedures and measures for emergency response including evacuations and medical treatment? <input type="checkbox"/> Identification of facility emergency response personnel and/or contractors and their responsibilities? <input type="checkbox"/> Coordination with local emergency responders? <input type="checkbox"/> Procedures for emergency response equipment deployment? <input type="checkbox"/> Any other action identified in the emergency response plan, as appropriate?	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A

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<p>1.b.(16) Has the owner or operator prepared an evaluation report within 90 days of each field and tabletop exercise, which included: [68.96(b)(3)]</p> <p><input type="checkbox"/> A description of the exercise scenario?</p> <p><input type="checkbox"/> Names and organizations of each participant?</p> <p><input type="checkbox"/> An evaluation of the exercise results including lessons learned?</p> <p><input type="checkbox"/> Recommendations for improvement or revisions to the emergency response exercise program and emergency response program, and a schedule to promptly address and resolve recommendations?</p>	<p><input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A</p>
<p>1.b.(17) Has the owner or operator satisfied the requirement to conduct notification, field and/or tabletop exercises through alternative means such as: [68.96(c)]</p> <p><input type="checkbox"/> Exercises conducted to meet other Federal, state, or local exercise requirements, provided the exercise meets the requirements of paragraphs (a) and/or (b) of this section, as appropriate. [68.96(c)(1)]</p> <p><input type="checkbox"/> Response to an accidental release, provided the response includes the actions indicated in paragraphs (a) and/or (b) of this section, as appropriate. When used to meet field and/or tabletop exercise requirements, the owner or operator shall prepare an after-action report comparable to the exercise evaluation report required in paragraph (b)(3) of this section, within 90 days of the incident. [68.96(c)(2)]</p>	<p><input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A</p>
<p>For all responding and non-responding stationary sources:</p>	
<p>2. Has the owner or operator of a stationary source coordinated response needs with local emergency planning and response organizations to determine how the stationary source is addressed in the community emergency response plan and to ensure that local response organizations are aware of the regulated substances at the stationary source, their quantities, the risks presented by covered processes, and the resources and capabilities at the stationary source to respond to an accidental release of a regulated substance? [68.93(a)]</p>	<p><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</p>
<p>3. Has coordination occurred at least annually, and more frequently if necessary, to address changes: At the stationary source; in the stationary source's emergency response and/or emergency action plan; and/or in the community emergency response plan? [68.93(a)]</p>	<p><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</p>
<p>4. Has coordination included providing to the local emergency planning and response organizations? [68.93(b)]</p> <p><input type="checkbox"/> The stationary source's emergency response plan if one exists?</p> <p><input type="checkbox"/> Emergency action plan?</p> <p><input type="checkbox"/> Updated emergency contact information?</p> <p><input type="checkbox"/> Other information necessary for developing and implementing the local emergency response plan?</p> <p><input type="checkbox"/> For responding stationary sources, has facility consulted with local emergency response officials to establish appropriate schedules and plans for field and tabletop exercises required under §68.96(b)? (See Items 1.b.(8), 1.b.(10), 1.b.(12), and 1.b.(14))</p>	<p><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</p>
<p>5. As of September 21, 2018, has the owner or operator documented coordination with local authorities, including: [68.93(c)]</p> <p><input checked="" type="checkbox"/> The names of individuals involved and their contact information (phone number, email address, and organizational affiliations)?</p> <p><input checked="" type="checkbox"/> Dates of coordination activities?</p> <p><input checked="" type="checkbox"/> Nature of coordination activities?</p>	<p><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A</p>
<p>6. Has the owner or operator of a stationary source with any Program 2 or Program 3 process conducted an exercise of the stationary source's emergency response notification mechanisms before December 19, 2024 and annually thereafter? [68.96(a)]</p> <p>(Owners or operators of responding stationary sources may perform the notification exercise as part of the tabletop and field exercises)</p>	<p><input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A</p>

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|--|---|
| 7. Has the owner/operator maintained a written record of each notification exercise conducted over the last five years? [68.96(a)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
|--|---|

Subpart G – Risk Management Plan [40 CFR 68.150 – 68.195]

Documented a Risk Management Plan as provided in 40 CFR 68.150-68.195?

Comments:

- | | |
|--|---|
| 1. Does the single registration form include, for each covered process: [68.160(b)(7)] <ul style="list-style-type: none"> <input checked="" type="checkbox"/> The name and CAS number of each regulated substance held above the threshold quantity in the process? <input checked="" type="checkbox"/> The maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits? <input checked="" type="checkbox"/> The five- or six-digit NAICS code that most closely corresponds to the process? <input checked="" type="checkbox"/> The correct program level of the process? | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Does the registration form include whether a public meeting has been held following an RMP reportable accident, pursuant to §68.210(b)? [68.160(b)(21)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 3. Does the owner or operator provide in the RMP: [68.180(a)] <ul style="list-style-type: none"> <input type="checkbox"/> Name, phone number and email address of local emergency planning and response organizations with which the stationary source last coordinated emergency response efforts, pursuant to §68.10(g)(3) or §68.93? [68.180(a)(1)] <input type="checkbox"/> The date of the most recent coordination with the local emergency response organizations, pursuant to §68.93? [68.180(a)(2)] <input type="checkbox"/> A list of Federal or state emergency plan requirements to which the stationary source is subject? [68.180(a)(3)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 4. For non-responding stationary sources, does the owner or operator identify: [68.180(b)(1)] <ul style="list-style-type: none"> <input checked="" type="checkbox"/> For stationary sources with any regulated toxic substance held in a process above the threshold quantity, whether the stationary source is included in the community emergency response plan developed under 42 U.S.C. 11003, pursuant to §68.90(b)(1)? [68.180(b)(1)(i)] <input type="checkbox"/> For stationary sources with only regulated flammable substances held in a process above the threshold quantity, the date of the most recent coordination with the local fire department, pursuant to §68.90(b)(2)? [68.180(b)(1)(ii)] <input checked="" type="checkbox"/> What mechanisms are in place to notify the public and emergency responders when there is a need for emergency response? [68.180(b)(1)(iii)] <input type="checkbox"/> The date of the most recent notification exercise, as required in §68.96(a)? [68.180(b)(1)(iv)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 5. For responding stationary sources, does the owner or operator identify the date of the most recent: [68.180(b)(2)] <ul style="list-style-type: none"> <input type="checkbox"/> Review and update of the emergency response plan, pursuant to §68.95(a)(4)? [68.180(b)(2)(i)] <input type="checkbox"/> Notification exercise, as required in §68.96(a)? [68.180(b)(2)(ii)] <input type="checkbox"/> Field exercise, as required in §68.96(b)(1)? [68.180(b)(2)(iii)] <input type="checkbox"/> Tabletop exercise, as required in §68.96(b)(2)? [68.180(b)(2)(iv)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

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6. Has the owner or operator reviewed and updated the RMP and submitted it to EPA for the following: [68.190(a)]? <input checked="" type="checkbox"/> Five-year update. [68.190(b)(1)] <input type="checkbox"/> Within three years of a newly regulated substance listing. [68.190(b)(2)] <input type="checkbox"/> At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)] <input type="checkbox"/> At the time a regulated substance is first present in a new process above threshold quantities. [68.190(b)(4)] <input type="checkbox"/> Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)] <input type="checkbox"/> Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)] <input type="checkbox"/> Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
7. If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever was earlier. [68.195(a)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A
8. If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change? [68.195(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A

Subpart H – Other Requirements [40 CFR 68.200 – 68.210]

Implemented Other Requirements as provided in 40 CFR 68.200-68.210?

Comments:

1. Has the owner or operator maintained records supporting the implementation of this part at the stationary source for five years, unless otherwise provided in Subpart D: Program 3 Prevention Program? [68.200]	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
2. Did the owner or operator hold a public meeting to provide information required under §68.42(b), no later than 90 days after any RMP reportable accident at the stationary source with any known offsite impact specified in §68.42(a)? [68.210(b)]	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A